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January 31, 2003

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th St. SW
Washington, D.C. 20554

Re: WC Docket 01-338

Dear Ms. Dortch:

The attached letter was sent to Lisa Zaina, Senior Legal Advisor to Commissioner Adelstein, in reference to the proceeding identified above.

In accordance with Commission rules, I am filing copies of this notice and attachment and request that they be included in the record of the proceeding identified above.

Sincerely,



Glenn T. Reynolds

cc: Christopher Libertelli
Matthew Brill
Jordan Goldstein
Dan Gonzalez
William Maher
Jeffrey Carlisle
Scott Bergmann
Michelle Carey
Thomas Navin
Brent Olson
Jeremy Miller
Lisa Zaina

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EX PARTE

Lisa Zaina
Senior Legal Advisor
Office of Commissioner Adelstein
Federal Communications Commission
The Portals, 445 12th Street SW
Room 8-C302
Washington, DC 20554

Re: **CC Docket No. 01-338**
Wireless Access to UNEs

Dear Ms. Zaina:

Thank you for taking the time to meet with BellSouth recently to discuss our alternative proposal for determining whether competitive local exchange providers are "impaired" in their ability to offer residential local service without access to unbundled switching. As part of that presentation, BellSouth explained that a disproportionate number of central offices with fewer than 5,000 lines were located outside of Metropolitan Statistical Areas (MSAs). In particular, page 6 of the presentation we provided at that meeting showed that 65% of wire centers located outside of an MSA had fewer than 5,000 lines, while only 27% of wire centers within an MSA had fewer than 5,000 lines. In response to an inquiry, I am attaching to this letter a similar chart comparing the breakdown of rural and non-rural wire centers with fewer than 10,000 lines. It demonstrates that, within BellSouth's network, 83% of the wire centers located outside of an MSA have fewer than 10,000 lines, but only 44% of wire centers within MSAs have less than 10,000 lines.

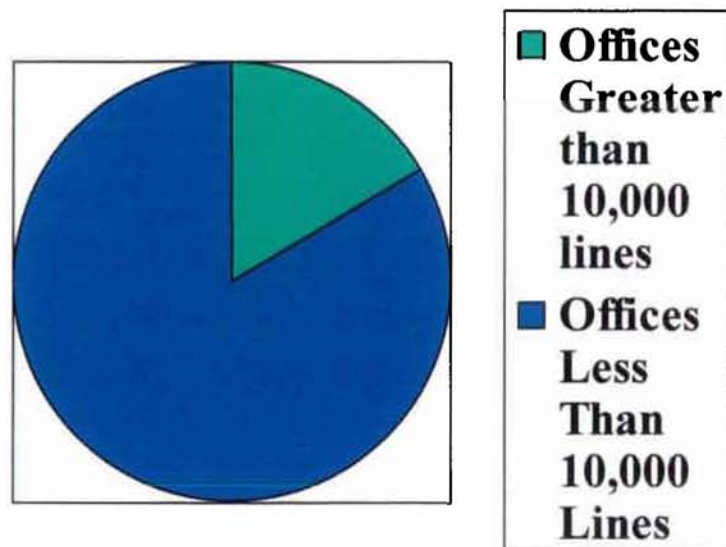
I hope this information is helpful to your deliberations. Please let me know if you have any additional questions concerning BellSouth's proposal.

Very Sincerely,



Glenn T. Reynolds

Wire Centers with Less than 10,000 Lines



Outside of an MSA Breakdown

- Within BellSouth's serving area, 83% of the wire centers located outside of an MSA have less than 10,000 lines. Within MSAs, 44% of wire centers have less than 10,000 lines.